New York State Department of Environmental Conservation
Office of Environmental Quality, Region 4
1130 North Westcott Road, Schenectady, New York 12306-2014
Phone: (518) 357-2045 • **FAX:** (518) 357-2398
Website: www.dec.ny.gov

Alexander B. Grannis
Commissioner

June 27, 2007

Mr. Andrew Kawczak
Environmental Manager
Taconic
136 Coonbrook Road
PO Box 69
Petersburgh, NY 12138

RE: Groundwater Sampling, Taconic, Town of Petersburgh, Rensselaer County

Dear Mr. Kawczak:

Receipt is acknowledged of your letter dated June 6, 2007 which requests discontinuation of the sampling of monitoring wells MW #1 and MW #4. We agree that sampling may be discontinued based upon the results of "below detection" for the past four years for volatile organic compounds and total petroleum hydrocarbons.

Should you have any questions, please contact me at 357-2377.

Sincerely,

Andrea J. Dzierwa, P.E.
Environmental Engineer II
Region 4

AJD/vaa-kawczak6-07

CC: CHA – L. Bibighaus
WOH – SCOTT FEIN, JANIS FALLON

TACONIC

136 Coonbrook Road • P.O. Box 69
Petersburgh, New York 12138
Telephone: 518.658.3202
Fax: 518.658.3204

June 6, 2007

Ms. Andrea Dzierwa P.E.
Environmental Manager
New York State Dept. of Environmental Conservation – Region 4
1150 North Westcott Road
Schenectady, New York 12306-2014

RE: Tonoga Inc. d/b/a Taconic --- of Petersburgh, New York

Dear Ms. Dzierwa:

Since April 2001, Taconic has transmitted to your office test data associated with ground water sampling of monitoring wells MW #1 & MW #4. This transmittal forwards the annual ground water sampling test data for MW#1 & MW#4 performed in April 2007 for VOCs and TPHs. A review of this test data indicates TPHs and VOCs were NOT detected at the reporting limits.

Due to the four year "< detection limit" levels measured for VOCs and TPHs, Taconic believes the sampling program should be discontinued. Thus, we ask your concurrence to discontinue the sampling program. Please advise.

Should you have any questions regarding this letter, please do not hesitate to call me at 518-658-3202, extension 288.

Sincerely,

Andrew Kawczak
Environmental Manager
Email: andyk@4taconic.com

CC: L. Carroll - Taconic
L. Bibighaus - CHA

For comparison purposes, shown below is a summary (of values greater than test method detection limits) of Volatile Organic Compounds (VOCs) & Total Petroleum Hydrocarbons (TPHs) test data associated with well #1 and #4 for the sampling periods shown. See analytical data for additional specific data.

Well #	Constituent	April 2001	November 2001	April 2002	October 2002	April 2003	October 2003	April 2004**	April 2005	April 2006	April 2007
1	VOCs	Acetone – 29 ug/L	2-Butanone - 25ug/L	< DL	< DL	< DL	< DL	<DL	<DL	<DL	<DL
	TPH	5.5 mg/L	7.2 mg/L	2.0 mg/L	< DL	< DL	3.0 mg/L	<DL	<DL	<DL	<DL
4*	VOCs	N/A*	< DL	< DL	< DL	< DL	< DL	<DL	<DL	<DL	<DL
	TPH	N/A*	< DL	< DL	< DL	< DL	2.0 mg/L	<DL	<DL	<DL	<DL

DL = Detection Limit: and equals 1 mg/l for TPH and equals 10 ug/L for 2-Butanone & Acetone

* MW#4 was not installed until September 26, 2001 thus April 2001 data is not available
** Annual (April) ground water monitoring was authorized by DEC in 2004.

CLOUGH HARBOUR & ASSOCIATES LLP

June 4, 2007

Mr. Andrew Kawczak
Taconic
136 Coonbrook Road
Petersburgh, New York 12138

RE: Annual Groundwater Monitoring Report for the Taconic Facility Located in Petersburgh, New York;
CHA Project No. 16798

Dear Mr. Kawczak:

The following letter report summarizes the field activities and the results of the groundwater samples collected on April 26, 2007 in compliance with the annual groundwater monitoring requirement for the Taconic facility (Site) located in Petersburgh, New York. The work was performed based on the recommendations outlined in Clough Harbour and Associates LLP (CHA) April 2001 Supplemental Environmental Investigation Report previously completed for the Site.

1.0 BACKGROUND

In October 2001, three monitoring wells (MW-1, MW-2, & MW-3) were installed as part of a Supplemental Environmental Investigation of the Taconic facility to determine the direction of groundwater flow, and the extent of contamination previously detected beneath the footprint of Building 2. A Site Plan showing the location of each monitoring well is included as Figure 1.

Following the results of the Supplemental Environmental Investigation, CHA recommended that monitoring well MW-1 be sampled on a semi-annual basis for water levels, TPH, and volatile organic compounds (VOCs). In addition, CHA recommended that one additional downgradient monitoring well be installed directly downgradient of Building 2, and included within the semi-annual monitoring program. On September 26, 2001, one additional monitoring well (MW-4) was installed downgradient of Building 2. The location of monitoring well MW-4 is illustrated by Figure 1. Semi-annual groundwater monitoring was conducted in association with monitoring wells MW-1 and MW-4 from April 2002 to April 2004.

As a result of non-detectable levels of VOCs and total petroleum hydrocarbons during the above referenced semi-annual monitoring events, the New York State Department of Environmental Conservation (NYSDEC) in a letter to Taconic dated July 28, 2004, approved a reduction in the frequency of monitoring from a semi-annual to annual frequency. As a result, groundwater monitoring is now conducted on an annual basis.

2.0 2007 ANNUAL GROUNDWATER MONITORING

In accordance with the recommendations outlined in the April 2001 Supplemental Environmental Investigation Report, and NYSDEC's July 2004 letter to Taconic, CHA personnel collected groundwater samples on April 26, 2007 from monitoring wells MW-1 and MW-4. All groundwater samples were collected using procedures consistent with NYSDEC protocols and as specified in CHA's Standard Operating Procedures for the collection of groundwater samples. Monitoring wells MW-1 and MW-4 were purged by removing a minimum of three well volumes. Field indicator parameters such as pH, Eh, temperature, conductivity, and turbidity were monitored to determine well stabilization. All samples were collected utilizing pre-cleaned disposable polyethylene bailers and transferring the collected water into the appropriate laboratory supplied containers. Copies of the field sampling data sheets are included as Attachment A.

Upon completion of the sampling activities, all groundwater samples were delivered to Upstate Laboratories, Inc. following proper chain of custody procedures. Upstate Laboratories, Inc. is currently certified by the New York State Department of Health's Environmental Laboratory Approval Program (ELAP). The samples were analyzed for volatile organic compounds (VOCs) via EPA Method 8260 and TPH following EPA Method 418.1.

3.0 RESULTS

The analytical results from the samples collected during this monitoring event were compared to the Ambient Water Quality Standards as listed in the NYSDEC Division of Water Technical and Operational Guidance Series 1.1.1 (TOGS 1.1.1). A copy of the complete laboratory data package is included as Attachment B.

Based on a review of the laboratory data, there were no VOCs detected at levels above the specified method detection limits in any of the samples collected during this monitoring event. Similarly, the level of TPH was also below detection limits during this monitoring event.

4.0 CONCLUSIONS AND RECOMMENDATIONS

Based on the analytical laboratory results obtained, the VOC and TPH analysis did not detect any contamination in the samples collected from monitoring wells MW-1 and MW-4. It should also be noted that VOC's have not been detected in any of the monitoring wells during the previous eight monitoring events and the parameter TPH has only been detected on an intermittent basis at relatively low concentrations.

Please do not hesitate to contact me with any questions regarding this submission at (518) 453-2897.

Very truly yours,

Clough Harbour & Associates LLP

Laury R. Bibighaus
Associate

SR/lrb

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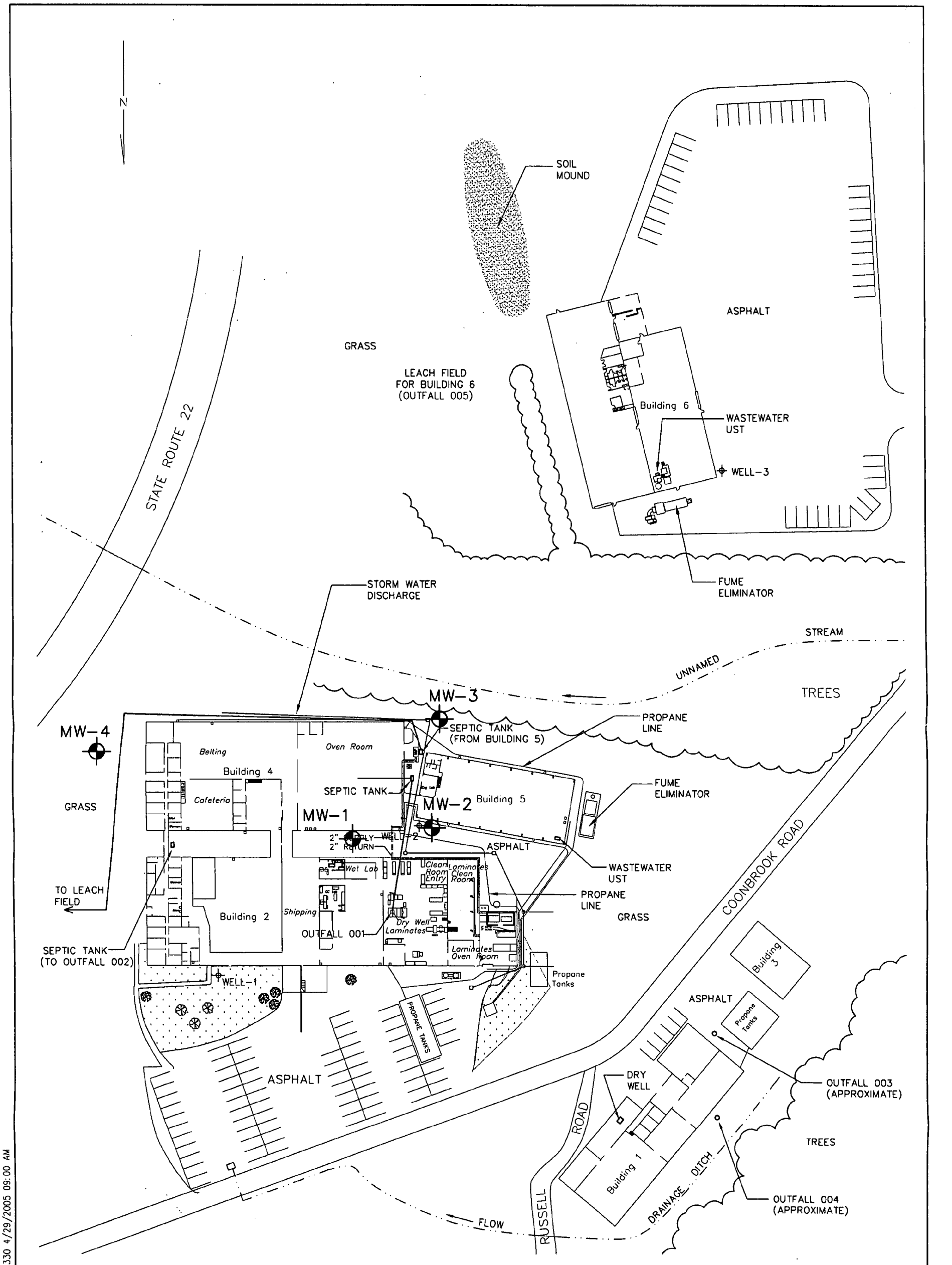

LEGEND

MW-1 MONITORING WELL LOCATION

APPROXIMATE SCALE: 1" = 100'

NOTE:

BASE MAPPING PROVIDED BY:
TACONIC, 136 COONBROOK ROAD
PETERSBURGH, NEW YORK 12138

CLOUGH HARBOUR & ASSOCIATES LLP
III Winners Circle, PO Box 5269, Albany, NY 12205
Main: (518) 453-4500 · www.cloughharbour.com

14276.1000.1102 | DATE: MAY, 2005

FIGURE 1
SITE PLAN
TACONIC
136 COONBROOK ROAD
PETERSBURGH, NEW YORK

File: M:\14276\ACAD\SITEPLAN.dwg User: 330 4/29/2005 09:00 AM

Attachment A

Field Sampling Data Sheets

Clough, Harbour & Associates LLP Well Sampling/Development Log	Sample/Well Designation: MW-1
Project Name: Taconic	Logged By: Scott Rosecrans
Project Location: Petersburgh, New York	Date: 4/26/07
Project Number: 16798	Screen Length: 10 ft.

Purge Information:

(1) Depth to Bottom of Well: 13.00 ft. (from TOC)
(2) Depth to Water: 4.30 ft. (from TOC)
(3) Column of Water: 8.7 ft. [(1) – (2)]
(4) Well Riser Diameter: 2 in.
(5) Volume Conversion: 0.163 gal./ft. (see below)
(6) 1 Well Volume: 1.42 gal. [(3) x (5)]

Method of Purging: ☐ WaTerra ☒ Bailer ☐ Submersible ☐ Other:

Volume Conversion: (gal./ft.)
2" = 0.163 4" = 0.653 6" = 1.469 8" 2.611 10" = 4.08

Field Analysis:

Volume Purged (gal.)	1.5	3.0	4.5							
Time	10:20	10:25	10:30							
ORP/EH (mV)	76.1	88.7	96.7							
pH	5.8	5.85	5.82							
Cond. (MS/CM)	1950	1931	1985							
Turbidity (NTU)	23.9	27.3	19.1							
D.O. (mg/L)	NR	NR	NR							
Temperature (°C)	8.87	9.06	9.07							

Total Volume Purged: 4.5 gal. Total Purge Time: 15 Min.

Sampling Information:

Sampling Method: Grab/Bailer
No. of Bottles: 3
Sampling Time: 10:35 AM
Sample Analyses: EPA 8260 VOCs, TPH

Comments: Installed new bailer and rope.
Slight orange colored water to clear water
Odorless
No sheen
No effervesce

Logged by: Scott Rosecrans

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Clough, Harbour & Associates LLP Well Sampling/Development Log	Sample/Well Designation: MW-4
Project Name: Taconic	Logged By: Scott Rosecrans
Project Location: Petersburgh, New York	Date: 4/26/06
Project Number: 16798	Screen Length: 10 ft.

Purge Information:

(1) Depth to Bottom of Well: 12.10 ft. (from TOC)
(2) Depth to Water: 2.22 ft. (from TOC)
(3) Column of Water: 9.88 ft. [(1) – (2)]
(4) Well Riser Diameter: 2 in.
(5) Volume Conversion: 0.163 gal./ft. (see below)
(6) 1 Well Volume: 1.61 gal. [(3) x (5)]

Method of Purging: ☐ WaTerra ☒ Bailer ☐ Submersible ☐ Other:

Volume Conversion: (gal./ft.)
2" = 0.163 4" = 0.653 6" = 1.469 8" 2.611 10" = 4.08

Field Analysis:

Volume Purged (gal.)	1.5	3.0	5.0							
Time	9:35	9:40	9:45							
ORP/EH (mV)	-68.8	-18.0	-2.1							
pH	5.56	5.61	5.58							
Cond. (MS/CM)	161	79	78							
Turbidity (NTU)	63.4	44.9	35.6							
D.O. (mg/L)	NR	NR	NR							
Temperature (°C)	5.3	4.99	4.83							

Total Volume Purged: 5.0 gal. Total Purge Time: 15 Min.

Sampling Information:

Sampling Method: Grab/Bailer

No. of Bottles: 3

Sampling Time: 9:47 AM

Sample Analyses: EPA 8260 VOCs, TPH

Comments: Installed New Bailer and rope.
Water clear/colorless and odorless
No effervesce

Logged by: Scott Rosecrans

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Attachment B

Laboratory Data Package

Upstate Laboratories, Inc.

Date: *25-May-07*

CLIENT: Clough, Harbour & Assoc. LLP
Lab Order: U0705067
Project: Taconic Plastics
Lab ID: U0705067-001

Client Sample ID: MW-1
Collection Date: 4/26/2007 10:35:00 AM
Matrix: WATER

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
PETROLEUM HYDROCARBONS, T/R		**SW8015B**		**(SW3510B)**		Analyst: **KC**
Petroleum Hydrocarbons, TR	ND	1.0		mg/L	1	5/22/2007
TCL VOLATILE ORGANICS		**SW8260B**				Analyst: **AT**
1,1,1-Trichloroethane	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
1,1,2,2-Tetrachloroethane	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
1,1,2-Trichloroethane	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
1,1-Dichloroethane	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
1,1-Dichloroethene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
1,2-Dichloroethane	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
1,2-Dichloropropane	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
2-Butanone	ND	10		µg/L	1	5/10/2007 10:16:00 PM
2-Hexanone	ND	10		µg/L	1	5/10/2007 10:16:00 PM
4-Methyl-2-pentanone	ND	10		µg/L	1	5/10/2007 10:16:00 PM
Acetone	ND	10		µg/L	1	5/10/2007 10:16:00 PM
Benzene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Bromodichloromethane	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Bromoform	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Bromomethane	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Carbon disulfide	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Carbon tetrachloride	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Chlorobenzene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Chloroethane	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Chloroform	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Chloromethane	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
cis-1,2-Dichloroethene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
cis-1,3-Dichloropropene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Dibromochloromethane	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Ethylbenzene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
m,p-Xylene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Methylene chloride	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
o-Xylene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Styrene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Tetrachloroethene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Toluene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
trans-1,2-Dichloroethene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
trans-1,3-Dichloropropene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Trichloroethene	ND	3.0		µg/L	1	5/10/2007 10:16:00 PM
Vinyl chloride	ND	2.0		µg/L	1	5/10/2007 10:16:00 PM

Approved By: _____ **Date:** _____

Qualifiers:

- * Low Level
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- ** Value exceeds Maximum Contaminant Value
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits

Upstate Laboratories, Inc.

Date: *25-May-07*

CLIENT: Clough, Harbour & Assoc. LLP
Lab Order: U0705067
Project: Taconic Plastics
Lab ID: U0705067-002

Client Sample ID: MW-4
Collection Date: 4/26/2007 9:47:00 AM
Matrix: WATER

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
PETROLEUM HYDROCARBONS, T/R		**SW8015B**		**(SW3510B)**		Analyst: **KC**
Petroleum Hydrocarbons, TR	ND	1.0		mg/L	1	5/22/2007
TCL VOLATILE ORGANICS		**SW8260B**				Analyst: **AT**
1,1,1-Trichloroethane	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
1,1,2,2-Tetrachloroethane	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
1,1,2-Trichloroethane	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
1,1-Dichloroethane	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
1,1-Dichloroethene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
1,2-Dichloroethane	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
1,2-Dichloropropane	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
2-Butanone	ND	10		µg/L	1	5/10/2007 11:07:00 PM
2-Hexanone	ND	10		µg/L	1	5/10/2007 11:07:00 PM
4-Methyl-2-pentanone	ND	10		µg/L	1	5/10/2007 11:07:00 PM
Acetone	ND	10		µg/L	1	5/10/2007 11:07:00 PM
Benzene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Bromodichloromethane	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Bromoform	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Bromomethane	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Carbon disulfide	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Carbon tetrachloride	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Chlorobenzene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Chloroethane	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Chloroform	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Chloromethane	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
cis-1,2-Dichloroethene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
cis-1,3-Dichloropropene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Dibromochloromethane	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Ethylbenzene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
m,p-Xylene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Methylene chloride	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
o-Xylene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Styrene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Tetrachloroethene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Toluene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
trans-1,2-Dichloroethene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
trans-1,3-Dichloropropene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Trichloroethene	ND	3.0		µg/L	1	5/10/2007 11:07:00 PM
Vinyl chloride	ND	2.0		µg/L	1	5/10/2007 11:07:00 PM

Approved By: _____ **Date:** _____

Qualifiers:

*	Low Level	**	Value exceeds Maximum Contaminant Value
B	Analyte detected in the associated Method Blank	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	S	Spike Recovery outside accepted recovery limits

Upstate Laboratories, Inc.

Date: *25-May-07*

CLIENT: Clough, Harbour & Assoc. LLP
Lab Order: U0705067
Project: Taconic Plastics
Lab ID: U0705067-003

Client Sample ID: ULI Trip Blank
Collection Date: 4/26/2007
Matrix: WATER

Analyses	Result	Limit	Qual	Units	DF	Date Analyzed
TCL VOLATILE ORGANICS		**SW8260B**				Analyst: **AT**
1,1,1-Trichloroethane	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
1,1,2,2-Tetrachloroethane	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
1,1,2-Trichloroethane	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
1,1-Dichloroethane	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
1,1-Dichloroethene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
1,2-Dichloroethane	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
1,2-Dichloropropane	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
2-Butanone	ND	10		µg/L	1	5/10/2007 11:57:00 PM
2-Hexanone	ND	10		µg/L	1	5/10/2007 11:57:00 PM
4-Methyl-2-pentanone	ND	10		µg/L	1	5/10/2007 11:57:00 PM
Acetone	ND	10		µg/L	1	5/10/2007 11:57:00 PM
Benzene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Bromodichloromethane	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Bromoform	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Bromomethane	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Carbon disulfide	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Carbon tetrachloride	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Chlorobenzene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Chloroethane	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Chloroform	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Chloromethane	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
cis-1,2-Dichloroethene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
cis-1,3-Dichloropropene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Dibromochloromethane	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Ethylbenzene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
m,p-Xylene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Methylene chloride	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
o-Xylene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Styrene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Tetrachloroethene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Toluene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
trans-1,2-Dichloroethene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
trans-1,3-Dichloropropene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Trichloroethene	ND	3.0		µg/L	1	5/10/2007 11:57:00 PM
Vinyl chloride	ND	2.0		µg/L	1	5/10/2007 11:57:00 PM

Approved By: _____ **Date:** _____

Qualifiers:

*	Low Level	**	Value exceeds Maximum Contaminant Value
B	Analyte detected in the associated Method Blank	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	S	Spike Recovery outside accepted recovery limits

CLOUGH HARBOUR & ASSOCIATES LLP

March 23, 2006

Mr. Andrew Kawczak
Taconic
P.O. Box 69
136 Coon Brook Road
Petersburgh, New York 12138

RE: Professional Engineering Services for Proposal to Conduct the Annual Groundwater Monitoring at the Taconic Facility Located in Petersburgh, New York
CHA Proposal No. X15260-P1

Dear Mr. Kawczak:

Clough Harbour and Associates LLP (CHA) is pleased to present this proposal to conduct the 2006 annual groundwater monitoring at the Taconic facility located in Petersburgh, New York. The Scope of Services to be performed under this proposal is presented as Exhibit A. Our project schedule is presented as Exhibit B, and our proposed project budget is presented as Exhibit C.

Thank you for providing CHA with the opportunity to submit this proposal for this project. CHA is prepared to commence work on this project immediately upon receipt of your duly authorized contract documents for this work. If the conditions of this proposal are to your satisfaction, please contact Laury Bibighaus so that the appropriate contract documentation can be initiated or purchase order issued to initiate the works.

In the interim, if you have any questions or concerns, please do not hesitate to contact Laury Bibighaus or myself at 453-4500.

Very truly yours,

CLOUGH HARBOUR & ASSOCIATES LLP

Richard F. Rappa, P.E.
Partner

RFR/rja
CC: L.Bibighaus, CHA

R:\Proposal\IFD\Proposal_06\X15260 Taconic Annual Groundwater Monitoring\doc.

Exhibit A

SCOPE OF SERVICES

Field Activities

In accordance with the recommendations presented in CHA's April of 2001 Supplemental Environmental Investigation Report, CHA will collect groundwater samples from existing monitoring wells MW-1 and MW-4 as part of the April 2006 annual monitoring event. As you are aware, samples were previously collected on a semi-annual basis from these locations. However, in a letter dated June 28, 2004, New York State Department of Environmental Conservation (NYSDEC) approved a reduction in the frequency of monitoring from a semi-annual to an annual frequency.

Prior to sampling activities, CHA will collect groundwater elevation measurements from all four monitoring wells that were installed as part of the Supplemental Environmental Investigations conducted at the site by CHA in April and September of 2001.

Groundwater samples will be collected only after each well is be purged by removing a minimum of three well volumes or until dryness. Field indicator parameters including pH, temperature, conductivity, and turbidity will be monitored during purging activities to determine well stabilization. Each monitoring well will be purged and sampled utilizing disposable polyethylene bailers. The sample containers will be placed in a cooler of ice and maintained at a temperature of 4°C for the duration of sampling and transport to the analytical laboratory for analyses.

All groundwater samples will be delivered to a laboratory certified under the New York State Department of Health Environmental Laboratory Approval Program (ELAP) following proper chain of custody procedures. Each sample will be analyzed for volatile organic compounds (VOCs) using EPA Method 8260 and total petroleum hydrocarbons (TPH).

Monitoring Report

Upon receipt of the analytical laboratory results, CHA will prepare a letter report documenting the field activities and laboratory result for the annual monitoring event. The reports will include a tabular summary of the laboratory results and our conclusions generated therefrom.

Taconic
Annual Groundwater Monitoring
CHA Proposal No. X15061-P1

Exhibit B

SCHEDULE

CHA is prepared to commence work on this project immediately upon receipt of your duly authorized contract documents or purchase order for this work. Pursuant to NYSDEC's June 2004 letter, the annual monitoring event is scheduled to be conducted in April 2006.

Exhibit C

FEE

CHA proposes to be compensated for the services referenced in Exhibit A and in accordance with the schedule presented in Exhibit B on a time and materials basis. Our estimated project budget is outlined below.

1. CHA Fees	$1,400
2. Subcontracted Laboratory	$600
TOTAL	**$2,000**

ENGINEERING REPORT

OF

WASTEWATER OPERATIONS

AT

THE TACONIC PLASTICS FACILITY
136 COONBROOK ROAD
PETERSBURGH, NEW YORK

Prepared For:

Taconic Plastics Limited
136 Coonbrook Road
Petersburgh, NY 12138

January 2001

CHA Project No: 9420.07.07

Prepared By:

CLOUGH, HARBOUR & ASSOCIATES LLP
ENGINEERS, SURVEYORS, PLANNERS
& LANDSCAPE ARCHITECTS
III Winners Circle
Albany, New York 12205

(518) 453-4500

File No: N:\9420\SPDES\Cov

1.0 Introduction

Taconic Plastics Ltd. (Taconic) entered into a Consent Order (No. R4-2000-0310-17) with the New York State Department of Environmental Conservation (NYSDEC) on August 17, 2000. As part of the Consent Order, a third party audit of the Taconic facility in Petersburg, New York was completed to assess compliance at the facility with federal and state environmental laws, rules, regulations, and permits. Taconic retained Clough, Harbour & Associates LLP (CHA) to complete the Environmental Compliance Audit and provide assistance for permitting and other activities needed to help bring the facility into compliance.

As part of the audit process, CHA reviewed the facilities State Pollutant Discharge Elimination System (SPDES) Permit. The audit identified several issues related to the facilities SPDES permit including:

- Some of the septic systems included in the permit are no longer in use.
- Two septic systems in use for new buildings are not included in the current permit.
- Process wastewater is no longer discharged to septic systems. All process wastewater is now collected in Totes for offsite disposal.
- The facility has a stormwater collection system that discharges to a tributary of the Little Hoosick River.
- Periodic testing of a fire protection system results in small discharges of non-process water to a creek.

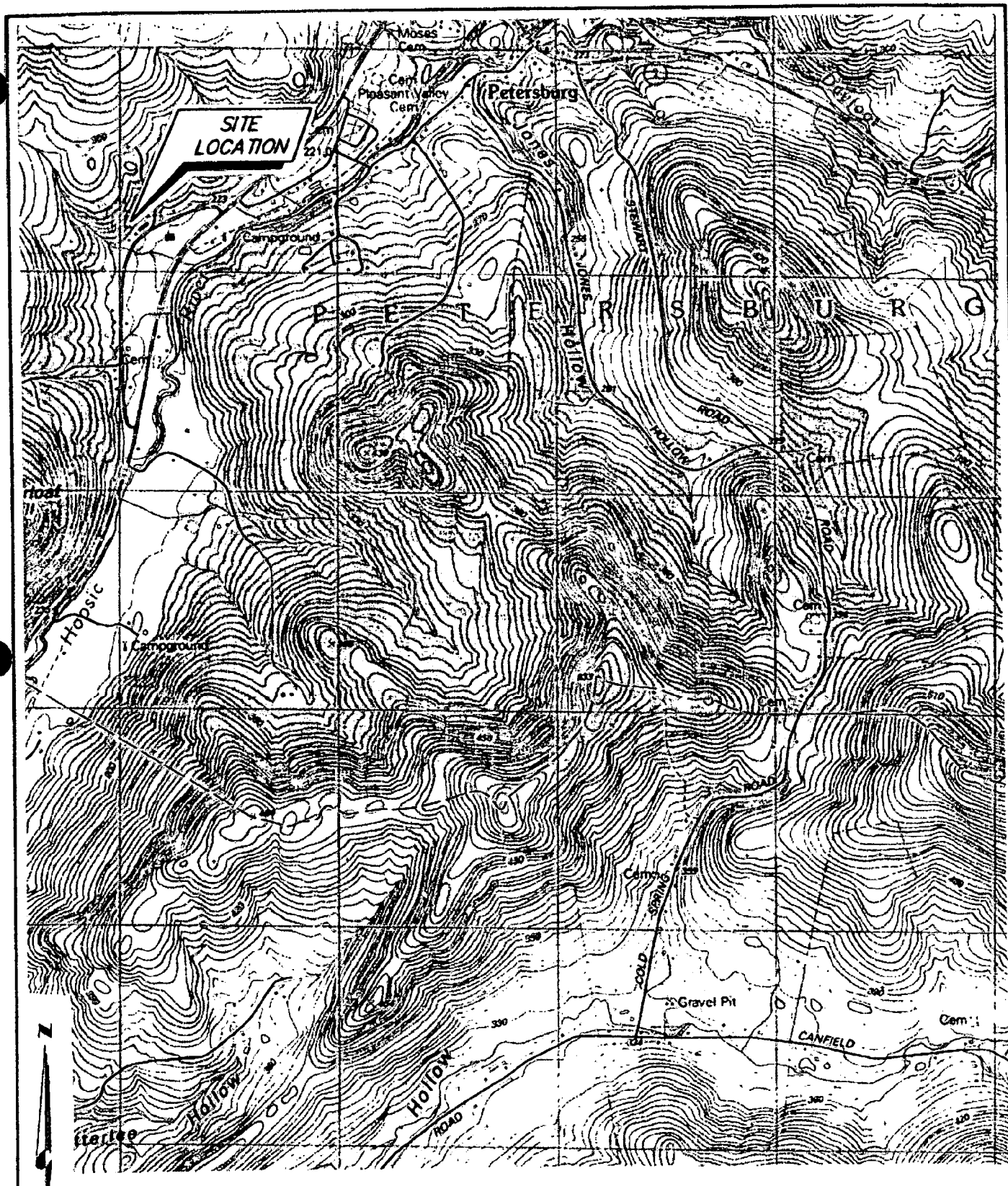
This engineering report has been prepared to provide the necessary information so that the current SPDES permit can be modified to reflect current operations.

1.1 Facility Description

The Taconic facility is located on Coonbrook Road, in the Town of Petersburgh, Rensselaer County, New York (See Figure 1). Taconic produces engineered composite materials for four primary markets: industrial, food products, architectural fabrics, and advanced dielectrics. Products manufactured by Taconic include specialty fabrics, pressure-sensitive tapes, engineered conveyor belts, silicone products, polytetrafluoroethylene- (PTFE) coated products for the food industry, PTFE- and silicone-coated fiberglass fabrics for architectural applications, and advanced dielectric laminates. The Petersburgh facility serves as the corporate headquarters for Taconic.

The site consists of several parcels that comprise the operational portions of the Taconic facility. A site plan for the Taconic facility is presented in Figure 2. The oldest portion of the facility consists of a 2.41-acre parcel located on the western side of Coonbrook Road and includes Buildings 1 and 3. Building 1 is a block-masonry building that was reportedly constructed in the 1960s. Two wooden frame additions are located on the eastern side of the building. Building 1 currently houses the adhesive coating operation. Building 3 is a metal frame building reportedly constructed in the mid-1980s. A carpentry shop is located in Building 3. Except for a paved lot between Buildings 1 and 3, grassy areas surround both buildings.

A second parcel, consisting of 22.59 acres located between Coonbrook Road and State Route 22, contains Buildings 2, 4, 5, and 6, which are metal frame structures. Building 2 was constructed in approximately 1984 and houses the laminating department. Building 4 was constructed in approximately 1989 and houses the belting department and coating equipment. Buildings 5 and 6 were constructed in 1994 and 1997, respectively, and both house state-of-the-art coating equipment. A paved parking lot is located north of Building 2 and the area east of and between Buildings 2 and 5 is also paved. A wooded area and a stream separate Building 6 from Buildings 2, 4, and 5. A paved lot is located on the western side of Building 6.



SOURCE: U.S.G.S. 7.5' Topographic
QUADRANGLE: BERLIN, NY

SCALE: 1"=2000'

CHA
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CLOUGH, HARBOUR & ASSOCIATES LLP
ENGINEERS, SURVEYORS, PLANNERS & LANDSCAPE ARCHITECTS
III WINNERS CIRCLE ALBANY, NEW YORK, 12205

9420.07.04

FIGURE 1
SITE LOCATION MAP
TACONIC PLASTICS LIMITED
PETERSBURG
NEW YORK

~~TAC EPA 00081~~

WELL #3

N

SOIL MOUND

10

ASPHALT

GRASS

LEACH FIELD FOR BUILDING 6 (OUTFALL 005)

9

Building 6

WASTEWATER UST

WELL-3

STATE ROUTE 22

FUME ELIMINATOR

STORM WATER DISCHARGE

STREAM

UNNAMED

TREES

PROPANE LINE

SEPTIC TANK (FROM BUILDING 5)

Belting

Oven Room

Building 4

Cafeteria

SEPTIC TANK

Building 5

FUME ELIMINATOR

GRASS

2" SUPPLY
2" RETURN

WELL-2

ASPHALT

WASTEWATER UST

Wet Lab

Clean Room Entry

Laminates Clean Room

TO LEACH FIELD

Building 2

Shipping

PROPANE LINE

GRASS

COONBROOK ROAD

OUTFALL 001

Dry Well

Laminates

Laminates Oven Room

SEPTIC TANK (TO OUTFALL 002)

WELL-1

Propane Tanks

Building 3

ASPHALT

PROPANE TANKS

Propane Tanks

DRY WELL

OUTFALL 003 (APPROXIMATE)

ROAD

TREES

Building 1

DRAINAGE DITCH

OUTFALL 004 (APPROXIMATE)

FLOW

RUSSELL

NOTE:
BASE MAPPING PROVIDED BY:
TACONIC PLASTICS, 136 COONBROOK ROAD
PETERSBURGH, NEW YORK 12138

APPROXIMATE
SCALE: 1" = 100'

File: N:\9420\ESA\9420FIG2.dwg Scale: 1000 10/10/2000 10:56:07 AM User:

CLOUGH, HARBOUR & ASSOCIATES LLP
ENGINEERS, SURVEYORS, PLANNERS & LANDSCAPE ARCHITECTS
III WINNERS CIRCLE ALBANY, NEW YORK, 12205

DWG. NO. 9420.07.04

DATE OCTOBER, 2000

FIGURE 2
SITE PLAN
TACONIC PLASTICS LIMITED
136 COONBROOK ROAD
PETERSBURGH, NEW YORK

A third parcel, consisting of 4.88 acres between Coonbrook Road and State Route 22, is located approximately 200 feet south of the second parcel described above. A wooden frame structure referred to by Taconic personnel as the Training Center, and a metal frame structure that houses a metal working shop are located on the parcel. The Training Center is used for employee training seminars and also houses an employee fitness room. The area surrounding the Training Center is primarily grassy.

1.2 Report Organization

Section 2 of this report presents a summary of each Outfall, the stormwater collection system and the fire protection system discharge and proposed permit modifications. A summary of information related to each outfall is provided at the end of Section 2. Appendix A provides a summary of the number of employees working in each building and the estimated daily sanitary flow for each Outfall.

2.0 SPDES Permit

The facility currently has a SPDES permit (NY-0223107) that became effective on November 1, 1998. The permit identifies four outfalls that discharge to groundwater at the facility. This section describes the wastewater and stormwater management at the facility and proposed modifications to the current SPDES permit to reflect current operations.

Sanitary wastewater from the various buildings is discharged to groundwater through septic systems located on-site. Five septic systems are currently active, but only three of these discharges (Outfalls 002, 003, and 005) are currently listed on the permit (NY-0223107, effective November 1, 1998).

Appendix A provides a summary of each building, number of employees working in each building, and the estimated daily sanitary flow for each Outfall. A total of approximately 200 employees work at the facility resulting in a calculated total daily sanitary flow of 5,000 gpd. Approximately 60 percent or 3,000 gpd of sanitary flow is estimated for the day shift with 1,000 gpd estimated for both the second shift and night shift based on the approximate number of employees working each shift. These estimates are based on 25 gpd per employee per shift as specified in the NYSDEC *Design Standards for Wastewater Treatment Works, Intermediate Sized Sewerage Facilities (1988).*

A SPDES permit was first issued by the NYSDEC on May 8, 1989, which became effective on May 15, 1989. This permit was renewed on May 15, 1994, and then modified on December 15, 1997. On November 1, 1998, a renewed SPDES permit became effective. This current permit expires on November 1, 2003.

The following is a description of each outfall and the proposed permit modification, if any.

2.1 Outfall 001

Outfall 001 is currently permitted for the discharge of process wastewater consisting of the following components:

- Wastewater generated from washing and rinsing utensils and equipment associated with the PTFE ovens in Building 4. This wastewater contained colloidal PTFE resin solids and trace amounts of various surfactants. This wastewater stream was reportedly generated at a rate of approximately 75 gpd.

- Wastewater generated from a sodium and anhydrous ammonia treatment process. Rolls of Teflon-coated glass fabric were treated with a sodium and anhydrous ammonia dispersion and then subsequently rinsed with water. The rinse water contained small amounts of ammonia and was reportedly generated at a rate of approximately 25 gpd.

- Wastewater from a sink located in the wet laboratory of the Laminates Department in Building 2. A copper etching process is reportedly performed in this laboratory and potential chemicals that may have been disposed to this sink include sulfuric acid, copper, and ammonia.

The wastewaters described above were discharged to a 1,000-gallon septic tank located just west of Building 4, which served as a settling tank to remove solids. From the septic tank, the wastewater flowed to a concrete dry well located on the western end of Building 2. The location of this dry well is illustrated in Figure 2.

The existing SPDES permit requires monthly monitoring of flow; and quarterly monitoring of nitrogen, ammonia, foaming agents [measured as Methylene Blue Active Substances (MBAS)], and pH.

Currently, all process wastewaters are collected and transported off-site by Precision Industrial Maintenance, Inc. (Precision) for disposal at the Hoosick Falls wastewater treatment plant. The process wastewater is stored in portable 275-gallon plastic totes and two underground storage tanks (USTs), one located in the northwestern corner of Building 5 (1,000-gallon concrete tank installed in 1992) and one located at the north-central end of Building 6 (3,000-gallon fiberglass tank installed in 1998).

In addition, two ASTs located in the northwestern corner of Building 4 are used, as necessary, to store process wastewater.

Approximately 12,000 – 15,000 gallons of wastewater is disposed off-site every 3 weeks (approximately 20,000 gallons per month). Discharge of process wastewater to Outfall 001 ceased in approximately 1994. Connections to the septic tank and dry well associated with Outfall 001 have been disconnected, but the tank and dry well remain in the ground. In December 2000, Taconic submitted a Work Plan for Closure of this septic tank and dry well system to NYSDEC, which was subsequently approved.

Taconic requests that the SPDES permit be modified to indicate that Outfall 001 is no longer in service.

2.2 Outfall 002

Outfall 002 is currently permitted to receive sanitary wastewater from Buildings 2 and 4 including the restrooms and a sink in the cafeteria area. A septic tank associated with the outfall is located between the eastern ends of Buildings 2 and 4. Design drawings for this septic system indicate that a 1,000-gallon septic tank discharges to a leach field in front of Building 2. The leach field consists of three 150-ft long trench laterals. Each lateral is 3 feet wide and the laterals were installed at a minimum 9-ft on center.

The wet laboratory sink in Building 2 that previously discharged to Outfall 002, has been disconnected and re-directed to a tote for off-site disposal. On November 22, 2000, a representative from CHA verified that this work has been completed, and the laboratory sink discharge is now being collected in totes for offsite disposal. Outfall 002 now receives only sanitary wastewater. Approximately 120 employees (out of a total of 200) work in Buildings 2 and 4 and contribute a calculated daily flow of 3,000 gpd to Outfall 002.

Taconic is requesting no change in the status of Outfall 002.

2.3 Outfall 003

Outfall 003 is currently permitted to receive sanitary wastewater from Building 1. The septic system associated with the dry well in Building 1 is still in operation. In December 2000, Taconic opened the top of the dry well and removed the accumulated sediment. Potential sources of wastewater were evaluated and it was determined that the restroom facilities in Building 1 are connected to the septic system. Based on visual observations, it appears that the septic system consists of a concrete dry well beneath the floor of the building, with an approximate capacity of 1,000 gallons. CHA and Taconic personnel have searched for records regarding the construction of this septic system but this is an old facility and no records have been found to date. All process wastewater streams generated in Building 1 are collected in totes for offsite disposal.

Approximately 12 employees work in Building 1 contributing a calculated daily sanitary flow of 300 gpd to Outfall 003. Taconic is requesting no change in the status of Outfall 003.

2.4 Outfall 004

Outfall 004 formerly received sanitary and process wastewater from Building 1, the oldest building on-site. This outfall was reportedly located on the northwestern side of Building 1; however, additional details on the construction of the outfall were unavailable. Outfall 004 was

listed on the initial SPDES permit, effective May 15, 1989, for sanitary wastewater only. According to a letter from Taconic to the NYSDEC, dated June 13, 1991, a process sink drain in Building 1 had been connected to Outfall 004. No additional information regarding the type of materials potentially discharged to the sink drain were available. The letter also stated that Taconic would disconnect the sink drain from the Outfall by June 21, 1991. Outfall 004 was subsequently abandoned and removed from the renewed SPDES permit, effective May 15, 1994.

2.5 Outfall 005

On December 15, 1997, the SPDES permit was modified to include Outfall 005, which receives sanitary wastewater from Building 6. A review of design drawings for this system shows that Outfall 005 was designed to handle up to 1,925 gpd of sanitary wastewater. The septic system consists of two 1,500-gallon septic tanks in series. The proposed leach field consisted of two alternately dosing beds of 700 linear feet each. The leach field is located east of Building 6.

Approximately 35 employees work in Building 6 contributing a calculated daily flow of 875 gpd to Outfall 005. Outfall 005 is currently listed on the SPDES permit and Taconic is requesting no change in the status of the outfall.

2.6 Other Septic Systems

Two other active septic systems are located at the site: one for sanitary wastewater from Building 5 and one for sanitary wastewater from the Training Center located south of Building 6. Neither of these septic systems are currently listed on the SPDES permit.

A review of the design drawing for Building 5 shows that sanitary wastewater flows to a 1,250-gallon septic tank then to a 1000-gallon pumping chamber. The flow is pumped to a leach field located northeast of Building 2. The leach field consists of seven 55-ft long laterals. The leach field has been designated as Outfall 006. Approximately 33 employees work in Building 5 contributing a calculated daily sanitary flow of 825 gpd to the septic system.

The training center consists of a small conference room, exercise room, and restroom facility. Drawings for the training center septic system could not be found in Taconic's files. However this facility is used only on an intermittent basis and flow to the septic system serving this facility is anticipated to be within the design capability of the system. This discharge has been designated as Outfall 007.

Taconic requests that consideration be given as to whether these outfalls require a SPDES permit.

2.7 Stormwater Management

Stormwater is collected in several catchment basins that discharge to an unnamed stream south of Building 4. These drains collect water from the parking lot and from paved areas between Buildings 2, 4, and 5. This discharge has been designated as Outfall 008.

Stormwater also flows to a drainage ditch to the north of Building 1. This discharge has been designated as Outfall 009. This ditch flows through a culvert under Coonbrook Road. All stormwater drainage ultimately flows to the Little Hoosick River approximately 0.5 miles from the facility.

Industrial activity at Taconic occurs indoors and there is no industrial activity that occurs outdoors based on visual observations during facility visits. Taconic requests that consideration be given as to whether these stormwater drainage systems need to be incorporated into the existing SPDES permit.

2.8 Fire Water System

Fire protection water is pumped from a pond north of Building 1 for use at the facility. Testing of fire protection sprinkling systems releases approximately 10 gallons of fire protection water each quarter from fire sprinkler systems in Buildings 1 and 6. This water is discharged from the northeast corner of Building 1 and designated as Outfall 010. The discharge from Building 6 is released to the rear of the building and is designated as Outfall 011.

Intermittent discharges of fire protection water may also occur during flushing and maintenance activities of the fire water system. Taconic requests that consideration be given as to whether these discharges need to be incorporated into the SPDES permit.

2.9 Summary

The table below provides a summary of each Outfall discussed above and Taconic's request for NYSDEC regarding each Outfall.

Outfall	Facility Served	Effluent	Permit Status	Taconic Request
001	Building 2	Process Wastewater	Permitted	Discharge has been removed. Request that the Outfall be shown as out-of-service.
002	Buildings 2 and 4	Sanitary	Permitted	No change.
003	Building 1	Sanitary	Permitted	No change.
004	Building 1	Sanitary	Removed from Permit	No change.
005	Building 6	Sanitary	Permitted	Consider if permit is needed.
006	Building 5	Sanitary	Not Permitted	Consider if permit is needed.
007	Training Center	Sanitary	Not Permitted	Consider if permit is needed.
008	Stormwater Drainage	Stormwater	Not Permitted	Consider if permit is needed.
009	Stormwater Drainage	Stormwater	Not Permitted	Consider if permit is needed.
010	Fire Water Bldg 1	Fire Water	Not Permitted	Consider if permit is needed.
011	Fire Water Bldg 6	Fire Water	Not Permitted	Consider if permit is needed.

Appendix A

Summary of Number of Employees and Calculated Daily Sanitary Flow for Each Outfall

Summary of Buildings, Approximate Number of Employees, and Calculated Sanitary Flow Rates

Building	Outfall No. [b]	Total No. of Employees per Day	Estimated Daily Sanitary Flow (gpd) [a]	Notes
1	003	12	300	
2	-	-	-	Included with Bldg 4, Outfall 002
3	-	-	-	No water in Bldg 3
4	002	120	3000	
5	Bldg 5 Septic	33	825	
6	005	35	875	
Training Center	Training Cent. Septic	<10	Intermittent	Occupied intermittently.
Total		200	5000	

a. Calculated flow is based on 25 gpd per employee.

b. Outfalls 001 and 004 have been closed in accordance with an approved Work Plan.